U.S. Census Bureau Responses to the Recommendations of the Census Advisory Committee of Professional Associations Made as a Result of the Meeting on May 18-19, 2006

Recommendation 1

2010 Decennial Census Program

Population Association of America Advisory Committee

2010 Census Communications Program

"The Population Association of America Advisory Committee (PAA/AC) submits the following:

- A. The PAA/AC applauds the Census Bureau's commitment to basing the Census 2010 communication program on research that would permit targeting groups for which communications can result in the biggest improvements in response and data quality. We urge the Census Bureau to move quickly to use existing data to inform communications plans.
- B. Consistent with the above recommendation regarding the integrated communications strategy for the 2010 Census, the PAA/AC requests that it be included in briefings on plans for research to determine targeted populations."

Census Bureau Response

- A. The Census Bureau is developing a research plan as part of the overall 2010 Census Communications planning process. Data on response patterns from the 1990 and 2000 censuses and the American Community Survey will help identify groups to target.
- B. The Census Bureau will continue to brief the PAA/AC on research plans.

Recommendation 2

Summary of Census Bureau Research Problems

American Statistical Association Advisory Committee

"The American Statistical Association Advisory Committee (ASA/AC) commends the Census Bureau on constructing the summary of some of the research priorities. We believe the contracts for students working on census related research will stimulate increased interest in these research areas."

We agree and we are looking forward to working with the committee on this project.

Population Association of America Advisory Committee

"The PAA/AC is very pleased that the Census Bureau will be funding several training fellowships to support the study of population statistics and related topics at the post graduate level. Although fellows will not be bound to work at the Census Bureau, these fellowships aim to recruit new professionals into the federal statistical agencies, including the Census Bureau.

The PAA/AC strongly recommends that information about the training fellowships and application procedures be disseminated to graduate programs outside the field of statistics. In particular, the PAA/AC notes that the field of demography is inherently inter-disciplinary. Demographers come from many backgrounds including statistics, sociology, geography, and other areas.

The PAA/AC therefore urges the Census Bureau not to limit the applicant pool of graduate fellows to those in statistics programs. The PAA/AC will be happy to work with the Census Bureau to inform the demographic community about the fellowships."

Census Bureau Response

Comments received/no response needed.

Recommendation 3

A Framework for Prioritizing Economic Statistics Programs

American Economic Association Advisory Committee

"The American Economic Association Advisory Committee (AEA/AC) submits the following:

In a budget cutting environment, any responsible agency must come up with priorities. Doing so, of course, does not imply that the agency thinks the lower priority items are without merit. It merely reflects the unfortunate fiscal reality. We applaud the explicit effort of the Census Bureau to ask users which census products they use and how much they value them. We also applaud the effort to assess the cost efficiency and data quality of the surveys.

With that as background, we have several specific suggestions and comments relating to the statistics gathered thus far:

1. We believe it is vital that the Census Bureau gather information from more of its users than just the Bureau of Economic Analysis (BEA) and the Federal Reserve Board (FRB). Private industry users, for example, are likely to be interested in

many different surveys or to put different values on the surveys. They are likely to be much more interested in geographic detail, for example. We recommend working with the National Association of Business Economics (NABE) and AUBER to help find out such priorities. In addition to the ratings of surveys, we recommend asking user communities to give rankings of survey usefulness. We also recommend assessing user value by tracking downloads of data, not just number of clicks.

- 2. We think it is important to consider more carefully the cost/efficiency measures of the surveys. Some surveys, for example, are new and their costs reflect start-up costs that ought not to be included in the ongoing survey costs. It is also important to think through standard statistical issues with the measures. For example, does a simple doubling of the number of respondents to a survey automatically improve its ranking? Does the scale of the ranking measures make a major difference to the results?
- 3. We encourage the Census Bureau to consider the costs of changing/streamlining existing surveys as an alternative to canceling surveys completely. For example, there is potential cost savings from consolidating the number of questions so that fewer forms could be used in the Annual Survey of Services. Also, consider reducing the time frequency of monthly surveys to quarterly, or adjusting the c.v. standards to be slightly less stringent. These steps might not have much impact on the value of the data but might allow for substantial cost reductions. We recommend exploring these options.
- 4. We also recommend that the Census Bureau consider cost sharing or other forms of partnering. We recommend exploring the potential of turning over some surveys being considered for elimination to large trade associations or other private entities (e.g., the repair and remodeling survey might be of interest to say, the National Association of Realtors or National Association of Home Builders). In such a case, the Census Bureau could operate in an advisory capacity.
- 5. We caution the Census Bureau to be careful about concluding too much from any particular rankings that are, by their nature, quite imprecise and approximate. We recommend assessing the robustness of ranking to alternative weights. The Census Bureau should also consider using shares of Gross Domestic Product variation as a criterion for evaluating the importance of a survey. We also recommend that census be circumspect in releasing these types of information outside the narrow planning community."

Census Bureau Response

The Census Bureau agrees that any set of criteria for prioritizing programs and balancing operating objectives (e.g., usefulness, cost, and quality) must be applied judiciously, improved continuously, and used as a framework and not a substitute for disciplined decision making.

Decisions to terminate, re-engineer, or streamline programs will use the program rankings as a tool, not a panacea. The Census Bureau will work with the National Association of Business Economics and other data user groups to seek additional perspectives on ranking the usefulness of economic programs. We also will investigate whether data downloads can provide supplemental information related to survey usefulness and value. We agree that cost efficiency measures must be used cautiously, and additional information is needed to better understand the underlying cost structure.

Recommendation 4

Communications Overview

American Marketing Association Advisory Committee

"The American Marketing Association Advisory Committee (AMA/AC) members sincerely appreciate that the Census Bureau, the Communications Directorate, and Mr. Jefferson Taylor prepared a detailed session to cover planning for the marketing and partnership programs in support of the 2010 Decennial Census on the agenda. The planning approach recognizes the complex marketing activities that must be undertaken to ensure a successful census.

Based on the presentations, questions and answers in the session, the AMA/AC makes the following recommendations:

- 1. The Census Bureau has documented the substantial lessons it learned from the evaluation of the Partnership and Marketing Program for Census 2000 (Census 2000 Topic Report No. 6). We recommend that personnel who were involved in preparing these evaluations be integral members of the Census Bureau team that prepares and reviews the Request for Proposal (RFP) for the 2010 Partnership and Marketing Program.
- 2. As input to the marketing plan to be developed by the prime contractor and to guide efforts to improve marketing effectiveness, we recommend that the Census Bureau capture what is already known about mail response rates and marketing activities; that it use a format similar to that used by the Census Bureau two years ago to summarize the state of knowledge with respect to enumeration problems (i.e., [a] identify groups that had different response characteristics, including groups that respond well; [b] identify reasons why people in those groups fail to respond to the mail questionnaire; [c] identify marketing actions that will address any problems and enhance response rates in each group; [d] prioritize marketing action based on the size of affected groups and the likely effectiveness of the actions.
- 3. The AMA strongly supports the Census Bureau's efforts to create a behavioral segmentation of the population to guide the development of the communication program. The AMA recommends that the Census Bureau continue to lead this

effort rather than delegate the responsibility to the prime contractor. The Census Bureau has the detailed knowledge and data concerning levels of response and personal characteristics of responders/non-responders from Census 2000 and the ACS. The level of quantitative modeling required is often too detailed for advertising agencies to implement.

- 4. The AMA recommends that the Census Bureau use its behavioral segmentation model to identify groups with low response probability. The results can be used to prioritize objectives for both Marketing and Partnership programs under the overarching goal of increasing responses at earlier, less expensive points on the contact continuum: by mail, e-mail, phone, in person interview. Research can be targeted to understand why there is a lack of favorable behavioral response at each of the various contact points. Research can determine whether non-responders have no awareness or intention (attitude) to participate. These findings would define the message or partnership activity necessary to counteract the lack of response. Ultimately, these findings would help identify potential media and partners to deliver the components of the message to move response further up the response funnel.
- 5. The AMA recommends that the Census Bureau develop a model to estimate the economic benefit from increasing responses at earlier, less expensive points on the contact continuum relative to the cost for marketing expenditures to drive the earlier responses. In particular, the model should estimate the response function between the mail response rate and (a) total marketing spending; (b) general media spending; (c) media specific spending with respect to television, radio direct mail, and out-of-home; (d) spending on partner programs; and (e) spending on specific types of partners. To develop and calibrate this model, several related steps will need to be implemented:
 - a. Topic Report No. 6 indicates that there is a lack of correlation between the intention to complete the census form and the actual behavior to complete the form. Therefore, testing that involves actual response behavior, particularly mail return of the form, will be required to understand marketing and partnership program effectiveness. It is important that the Census Bureau pull this testing forward in time so as to be prepared for the 2010 Census.
 - b. Small footprint, experimentally designed tests, which assess the effectiveness of both levels and mixes of media, are recommended. These would be similar to test markets that companies use to pre-test and optimize launches of new products. These should commence as quickly as possible and continue up to the 2010 Census.
 - c. The 2008 Dress Rehearsal provides an ideal platform to understand the relative effectiveness of both partnership programs and media. Testing of

- both media and partnership program deployments should be undertaken during the Dress Rehearsal.
- d. Response rates to the ACS by target group and (potentially) by media/partnership program treatment can help to calibrate a response model for Census 2010. The 2008 Dress Rehearsal should be used to estimate the "translation" function between ACS response rates at each stage of behavior (mail, phone, in-person) and the short form in the Census test. There are theories that the relative response rate for the Census short form could be higher because it is easier than the ACS to complete, or lower because there is no "community benefit" to completing the form. The comparison of ACS and the 2008 Dress Rehearsal would provide facts needed to plan the 2010 effort.
- e. The AMA recommends that the Census Bureau explore the possibility of using small-scale media tests in support of the ACS as a testing vehicle for the 2010 marketing communications and partnership program efforts. Such use would require the "translation function" described in the preceding item.
- 6. The AMA recommends that the selection of a contractor for the research evaluation of the marketing and partnership programs be selected separately from the prime contractor who will develop and implement the programs. This approach will maximize the potential to obtain an unbiased, fact-based evaluation of the program. Additionally, the Census Bureau should ensure consensus between the two contractors on the key consumer metrics and partnership performance metrics which will guide the evaluation.
- 7. The AMA recommends that communications management review and selection process led by the Census Bureau actively focus how strategy and creative approaches will extend in an integrated manner to non-broadcast media, live executions (e.g., radio DJs), and partnership program use. This will require the prime agency develop or subcontract for a full range of creative units that are targeted to non-broadcast media in support of candidate campaigns. It will require that the review process allocate review time in keeping with the budget and objectives assigned to non-broadcast and partnership initiatives.
- 8. The AMA is encouraged by the Census Bureau efforts to utilize new on-line and user generated content approaches to support the 2010 Census. New media and user content, like blogs, may facilitate messages to micro targets and specific target languages. The AMA recommends that response data from the 2008 Dress Rehearsal be used to understand which targets (e.g., young singles) might be well-targeted through these tools. Also, the AMA recommends that the Census Bureau explore services used to track user generated content (e.g., Intelliseek, Umbria) to identify Census related topics that arise in the 2008 Dress Rehearsal

- and identify key opinion sites to guide selection of online partners.
- 9. The AMA recommends that the Census Bureau determine what best practices can be learned from word-of-mouth marketers like Tremor and BuzzAgent. These marketers specialize in influencing word-of-mouth outcomes. Their practices may be useful in designing the content and tools to be used in the partnership programs and in identifying potential community partners."

- 1. The 2010 Census Communications team will work closely with staff involved in the Census 2000 evaluations of the partnership and marketing program, beginning with the draft Request for Proposals.
- 2. The Census Bureau, as part of the 2010 Census Communications research plan, will identify response patterns by demographic and housing characteristics, identify barriers to responding, identify messaging and tactics to improve response, and set priorities for the marketing efforts. This information will be provided to the agencies awarded the 2010 Census Communications contract.
- 3. The Census Bureau plans to begin work on a behavioral segmentation of the population based on the 1990 and 2000 censuses, and the American Community Survey. In consideration of the AMA recommendation, and depending on resources and timing, we will either complete the work in-house or contract it out to an appropriate research company.
- 4. The Census Bureau plans to use its behavioral segmentation model as recommended.
- 5. The research plan for the 2010 Census Communications effort will include developing a model to estimate the economic benefit from targeting different groups along a continuum of response from mailback to nonresponse followup. For the decennial census, the points of contact will be the initial questionnaire, a replacement questionnaire, and the in-person interview.
 - a. and b. We have investigated various ways to test marketing and partnership using actual response behavior and have concluded that such a test would be exorbitantly expensive and would not yield meaningful results for these reasons. First, the partnership and marketing program is multi-faceted, touching people through their places of worship, their childrens' schools, their communities and using the news media, advertising, and special events. The advertising alone (in 2000) targeted over 20 different population groups in 15 languages and used national and local television, radio, print, and out-of-home. Media buying was targeted to reach 95-99 percent of key audiences 50 or more times on average. This level of activity would have to be scaled back and it would not be certain whether

a scaled-back version would give us a clear assessment of the program's effectiveness. Also, the cost of researching and producing even a scaled-back advertising campaign would be high.

c. The Dress Rehearsal is not intended to serve as another test for decennial programs and operations, but rather the opportunity to pull together teachings from prior tests and see how they work together. In the case of the communications program, funding is not available to test program components to date, and significant funds are not likely to be available until fiscal year 2008.

We agree that the dress rehearsal is an ideal platform to understand how the communications program will work for 2010 to the extent that resources and the dress rehearsal site composition allow. Although there will be no formal testing of the communications program, there are a number of key processes that we plan to assess during the dress rehearsal and revise for the 2010 Census. Processes such as using response data to identify target audiences and language needs, printing, translation, distribution, product review, etc.

In addition to the dress rehearsal, the Census Bureau is trying to identify research that can be done at low or no cost, relative to planning the 2010 Census Communications program. We would also like to continue discussions with the AMA regarding research alternatives, solutions, etc.

- d. and e. The Census Bureau will look into ways to better understand the "translation" of response behavior for the ACS into short-form census response behavior.
- 6. The Census Bureau will select an <u>independent</u> contractor for the evaluation of the 2010 Census Communications program, as was done for Census 2000. We will work with the AMA Committee to determine the appropriate metrics.
- 7. The Census Bureau will carefully examine ways to extend the communications program both to non-broadcast media and also to other entities, such as partners and governments. Our experience in Census 2000 demonstrated that there are various legal and cost constraints involved in sharing some of the advertising with partners. We have been looking into ways to do this for the 2010 Census.
- 8. The Census Bureau has decided not to offer Internet response in the Dress Rehearsal, but there is ample research, syndicated and public, into the characteristics of users of new electronic media. As this is a rapidly changing environment, we will continue to monitor usage.
- 9. The 2010 Census Communications Acquisition Team will look into best practices in

word-of-mouth marketing.

Recommendation 5

Content, Including Mode Consistency

American Statistical Association Advisory Committee (ASA/AC)

"The ASA/AC submits the following:

Research to Improve Census Imputation Methods

- 1. The use of administrative records as a source for imputation of missing data appears very promising and the ASA/AC supports further work in this area. Obtaining sufficiently high match rates to the administrative source will be important in making this an effective strategy.
- 2. The ASA/AC recommends that the Census Bureau carefully consider the privacy implications of using data that were collected for one purpose for an entirely different purpose without the informed consent of the respondent.
- 3. The ASA/AC encourages further research on item imputation, including an alternative approaches to hot-deck imputation beyond the Census Bureau "flow basis" hot-deck procedure and on other strategies, such as embodied by the Statistics Canada CANCEIS system, that incorporate different conceptions of exchangeability between units."

Census Bureau Response

The Census Bureau will conduct an extensive evaluation of the item imputation process used in the 2006 Census Test. After the Test, the Census Bureau will choose an item imputation methodology for the 2008 Census Dress Rehearsal and the 2010 Census. The issues raised by the Committee will be a factor in that decision. Regardless of which item imputation method is used in the 2010 Census, it is likely that research will continue to identify possible improvements in item imputation.

Mode Consistency

"The ASA/AC commends the Census Bureau's work on mode consistency guidelines, and believes that this work would be beneficial to the broader survey methods community in providing a framework for developing multi-mode instruments and in identifying research to mitigate mode effects caused by survey instruments. Thus, we recommend that the Census Bureau publicly disseminate a document describing these guidelines such as in a professional journal.

In support of current research to understand mode effects, the ASA/AC would encourage efforts to clarify the ideal targets of measurement, which might suggest useful study design strategies, such as using multiple measurement modes on samples of individuals, and which might help identify mode effects amidst other measurement error phenomena."

Census Bureau Response

The Census Bureau concurs that the Mode Consistency Guidelines should be publicly disseminated after they are finalized and agrees that further research should be conducted in this area. We are currently in the process of defining and prioritizing the evaluations and experiments for the 2010 Census and will take this recommendation into account.

Population Association of America Advisory Committee (PAA/AC)

Allocation Flags

"The PAA/AC commends the Census Bureau on conducting very competent research focusing on improved imputation methods.

The results indicate that the advantages in using administrative records to assign the missing person records of sex, age, race and Hispanic origin are remarkable. These data assignments made from administrative records are far superior to the null model of independence.

Clearly the proposed strategy for 2010 would be to use administrative records, when possible, for sex, age, race, and Hispanic origin. The issue of tenure and relationship would seem to require the hot deck strategy. The Kappa values for these two variables using the hot deck are fair to good.

Currently, the public use microdata files use one allocation flag if a given record has been imputed. The PAA/AC urges the Census Bureau to use separate flags for different allocation/assignment strategies.

Consider the case of a person not indicating the race response. This value may be obtained in several ways:

- 1. Imputing a race response from others within the same household who have reported race
- 2. Assigning race from administrative records data
- 3. Using a hot deck approach
- 4. Using whole household substitution
- 5. Implementing some other strategy, not yet determined.

If the Census Bureau follows the present approach, it would use only one allocation flag to tell the user that race has been assigned or imputed. We encourage the Census Bureau to have multiple flags. If all of them are zero, this tells the user that the data item was reported by the respondent. If they are all not zero, then the user knows just how race was assigned or imputed.

This recommendation is particularly important if an Administrative Records approach is used because this method is not, strictly speaking, an imputation approach, but an assignment of data."

Census Bureau Response

The Census Bureau understands and appreciates the issue raised by the Committee, and will consider how to address this issue in the process of creating public use files.

Administrative Records and Confidentiality

"The use of administrative data to improve imputation methods represents a potentially important innovation and we commend the Census Bureau for experimenting with it. However, we must also ask the Census Bureau to consider the directions in which this use might lead and to recognize that any merged files will need extreme degrees of protection from other agencies of government, as well as from persons and organizations outside of government.

The very possibility of merging census records with administrative ones, e.g., from the Social Security Administration, raises the prospect that "super" records about individuals will be created, which could be enticing to other agencies, such as the Department of Homeland Security. It could dramatically undermine public confidence in the Census if any handover of such records were to occur. These records, it should be noted, entail the merger information collected for other purposes and used, in this context, without the permission or even the knowledge of the individuals involved.

Moreover, we want to remind the Census Bureau that resistance to a regular census has increased in some countries where comprehensive data files with information from administrative and other sources have been created. In Germany after 1987, this resistance forced the abandonment of the census.

This is the time to think about the potential directions that the incorporation of administrative data into census operations might take."

Census Bureau Response

The U.S. Census Bureau is mandated by law to use administrative records to the maximum extent possible to reduce duplication, cost, and respondent burden. In fact, the Census Bureau has been using administrative records to support its demographic programs since the 1940 Census. Administrative records were instrumental in measuring the first differential undercount. Our Intercensal Estimates, which are used to allocate hundreds of billions in federal funds, are based on administrative records. Recognizing the importance of administrative records to Census Bureau programs, the Census Bureau recently incorporated uses of these data into our Strategic Plan.

The Census Bureau also has conducted extensive research on the feasibility and desirability of

using administrative records to supplement the decennial census, especially since the early 1990s. Such research has shown that using administrative records to supplement the decennial census is an inexpensive but effective means to improve coverage.

The Census Bureau considers using administrative records to supplement the decennial census only if the following criteria are met:

- Must improve accuracy
- · Must be operationally feasible
- · Must be legal, ethical, and comply with our policies

Subsequently, research has demonstrated that administrative records are useful to:

- · Fill out missing items, resulting in substantial error reduction.
- · Augment lists of Group Quarters, improving coverage.
- Develop statistical models for identifying areas needing coverage follow-up, resulting in a decrease in within-household omissions.

The Census Bureau understands the Committee's concerns about administrative records and would only use the data from other sources if those data can be shown to improve the ultimate data products. The Census Bureau also is cognizant of potential concerns, including those you have raised. Title 13, United States Code, provides stringent confidentiality protections to these data, just as it does to census and survey information. Those constraints would prevent the Census Bureau from handing over linked record files to other agencies in the future. Nonetheless, we will test the messages we will use to inform the public of our plans to minimize any concerns they may have. Furthermore, the Census Bureau has no intent to replace respondent replies with data from administrative records.

Final Format and Content for Race, Hispanic Origin, and Ancestry

"Because results from the 2005 test are not available yet, the PAA/AC recommends that the Census Bureau delay a final decision on the final format and content of the questions on race, Hispanic origin, and ancestry until results from the 2005 test have been shared and discussed with the PAA/AC and other appropriate census advisory committees."

Census Bureau Response

The Census Bureau concurs.

Race and Hispanic Origin Collection, Editing, and Imputation Procedures

"The PAA/AC commends the Census Bureau for its continuous research on the collection, editing, and imputation procedures for race and Hispanic origin data.

1. To maintain consistency with prior censuses, the PAA/AC recommends that the Census Bureau continue to use the Office of Management and Budget's (OMB's) Hispanic and race definitions to edit and assign write-in responses of national

- origin to the Hispanic and race questions. We further recommend thorough testing of alternative editing procedures.
- 2. If there are changes in the editing procedures for race and Hispanic origin, the PAA/AC recommends the publication of crosswalk tables to allow comparison of old and new editing techniques."

The Census Bureau concurs.

Hispanic Origin

"The PAA/AC is very appreciative of the efforts the Census Bureau is making to attend to the well-known problems associated with the Hispanic-origin question in Census 2000. However, the PAA/AC must reiterate the concern expressed in its previous recommendation from the October 2005 CACPA meeting (Recommendation 14) about the exclusion of multiple-origin reporting on this question. Multiple reporting includes the possibility of two or more different Latin American origins – e.g., individuals who are of Cuban and Mexican ancestry – or a Hispanic origin and a non-Hispanic one.

The Census Bureau's response indicates that such multiple origins cannot be recognized in the 2010 Census because of a lack of time to "design, test, and analyze" a new question. However, we remain very concerned about the lack of realism in Census Bureau reports of the Hispanic-origin population. This population is likely to be significantly larger than any other minority population by 2010. Research shows, moreover, that the intermarriage rate by Hispanics is substantial. Thus the population with mixed origins, at least one of which is Hispanic, is increasing. In effect, the current Census Bureau question treats Hispanic origins according to a one-drop rule. The inability to report on the degree of overlap between the Hispanic population and other major racial/ethnic populations is providing Americans with a misleading picture of the evolution of the racial/ethnic composition of the United States at a time of high levels of immigration from Latin America and increasing racial/ethnic intermarriage. Potentially, this inaccuracy could contribute to already contentious views of Americans on immigration and the changes associated with it.

We recommend, at a minimum, that the Census Bureau devise an experimental panel for the 2010 Census to test an alternative formulation of the Hispanic-origin question that allows for multiple responses."

The issue of collecting multiple responses to the Hispanic-origin question was first raised in Federal Register Notice No. 15 by the Office of Management and Budget (OMB) on October 30, 1997. Please see "Revisions to the Standards for the Classifications of Federal Data on Race and Ethnicity. Federal Register: October 30, 1997" at the following Web site: <www.whitehouse.gov/omb/fedreg/1997standards.html>. In the notice, OMB recognized the importance of allowing individuals to select both "Hispanic origin" and "Not of Hispanic origin" for diversity reasons. However, because of the lack of research in this area and concerns about the possible impact of any change on the quality of the origin data, the provision to allow respondents to select both "Hispanic origin" and "Not of Hispanic origin" was not included in the 1997 standards. Thus, the current OMB guidelines on race and ethnic collection suggest that respondents must be classified into one origin response category. The OMB suggested further research on multiple-response reporting to the Hispanic-origin question. The Census Bureau responded to OMB and released Working Paper #77, "Analysis of Multiple Origin Reporting to the Hispanic Origin Question in Census 2000" by Roberto R. Ramirez, at the following Web site: <www.census.gov/population/www/documentation/twps0077.html>. The Census Bureau plans to study the reporting of more than one origin to the Hispanic-origin question in the future. However, at this point, it would not be possible to design, test, and analyze a question to elicit multiple responses on Hispanic origin and get approval from OMB in time for the deadlines for content decision.

Mode Consistency

"The PAA/AC commends the effort to date by the Working Group on Mode Consistency. The Working Group's draft guidelines reveal the challenges of ensuring universal presentation when questionnaires are administered across different modes which may entail differences in question format, phrasing, and questionnaire design, all of which can compromise data quality. The issue of potential mode effects will become more evident because both the 2010 Census and the ACS will employ multiple modes of data collection (mail out/mail back questionnaires and telephone and personal interviews) and use multiple instruments and questionnaires (paper and electronic).

- A. The PAA/AC recommends that the Census Bureau implement the following two recommendations of the Mode Consistency Working Group:
 - Clarify and document roles and responsibilities of different areas of the Census Bureau in the development of the instruments for census and other surveys to minimize the problem of fragmentation identified by the Mode Consistency Working Group.
 - Create an ongoing structural capability for addressing current and future mode technical and policy issues.

- B. In addition, while guidelines are important, their efficiency can only be determined through research. Therefore, the PAA/AC strongly recommends that the Census Bureau design and conduct research in the following areas:
 - Pretest of questionnaires that are not administered through mail out/mail back.
 - Pretest of questionnaires that are administered in languages other than English, across different modes, to assess how mode consistency effects may interact with other characteristics such as limited English proficiency.
 - Conduct a comparison of data responses from a random sample of respondents to similar questions administered using multiple modes (mail out/mail back, telephone and personal interviews) and multiple instruments (paper and electronic).

Mode consistency effects have the potential to seriously compromise data quality in terms of reliability and validity. The PAA/AC looks forward to hearing more about this important topic at future advisory committee meetings."

Census Bureau Response

The Census Bureau concurs. We are currently in the process of defining and prioritizing the evaluations and experiments for the 2010 Census and will take this recommendation into account.

Recommendation 6

Microdata Results from Business List Comparison Project

American Economic Association Advisory Committee (AEA/AC)

"The AEA/AC applauds the joint effort by the Census Bureau and the Bureau of Labor Statistics (BLS) to examine consistency of their respective business lists. We encourage them to continue working on this issue. In particular we recommend:

1. There should be further work on following up the discrepancy in total employment between the two lists. In aggregate, on the matched sample the Census Bureau has about 5 percent higher employment. It is challenging to compare multi-establishment enterprises because of different rules for grouping these firms by the respective agencies. However, initial results indicate that the discrepancy holds at about the same rate for single unit enterprises. Since these groups can be more conveniently compared, it would be useful to examine this group in greater detail. For example, it would be useful to examine whether discrepancies vary systematically with characteristic of firms, such as state, firm size, industry, and age. Furthermore, it is important to compare the same

- establishments over different years to see when discrepancies materialize and whether they persist.
- 2. We applaud the examination of the consistency in level. We also recommend comparing consistency in changes over time.
- 3. We do not recommend solely examining a single year. By focusing on single-unit establishments, it might be possible to examine a number of years of data at low cost.
- 4. We reiterate that it would be useful to compare employment of Professional Employer Organizations (PEO) across the Census Bureau and the BLS. A problem with PEOs is that a firm leasing an employee might be in one state while the employee works in another state. State agencies managing unemployment insurance programs will have an incentive to collect taxes on workers that will be covered in their states. Since the BLS data is based on these UI programs, the allocation of workers across states in this industry for the BLS could be quite different than in census data.
- 5. We also recommend that the Census Bureau and BLS initiate a conversation with the public suppliers of the data, state by state, in order to better understand definitions, data quality, and other causes of discrepancies. Furthermore, private suppliers should be approached where appropriate. For example, payroll processors, such as ADP, may be able to add further insight."

We appreciate the Committee's suggestions and will move forward with their recommendations as stated.

Recommendation 7

2010 Demographic Surveys Sample Redesign Issues

American Statistical Association Advisory Committee (ASA/AC)

"The ASA/AC submits the following:

1. The ASA/AC recommends that the Census Bureau identify how design and analysis goals for surveys in the 2010 Survey Redesign effort differ from the current goals of the ACS-driven map update process. The Census Bureau should use this information to evaluate how the Master Address File (MAF) update process should be modified to accommodate the use of MAF for the 2010 Survey Redesign.

- 2. The ASA/AC recommends that the Census Bureau establish a formal and well-defined evaluation program for MAF. The goals of this program should include production of estimates of frame coverage and other survey quality measures, and identification of areas for targeted improvement of MAF. The evaluation program should include an annual (or regular and frequent) study to quantify the quality of MAF and update sources, and systems that track problems experienced in survey operations I counties.
- 3. The ASA/AC recommends that the Census Bureau investigate methods to improve precision of direct ACS estimates for variables used in the 2010 Sample Redesign, and evaluate the correlation of ACS variables for sample design with variables of interest from the target surveys to assess their potential to improve the precision for survey estimates.
- 4. Given that the new design may have to last for several years, the ASA/AC recommends that the Census Bureau consider the stability over time of the variables used for stratification, not just their correlation with the variables of interest at the time the sample is designed. The use of variables that are less stable can result in significant deterioration of the sample design over time.
- 5. There are several reasons why integration of the ACS and the demographic surveys into a two-phase approach may be desirable, including reduced collection costs, improved quality, and more flexibility to mount new surveys. There are also some disadvantages, such as sub-optimal sample designs, response burden, and problems of respondent mobility between the ACS and the second phase survey. The ASA/AC recommends that the Census Bureau examine approaches being developed in other countries, particularly the Office for National Statistics in the United Kingdom."

American Statistical Association Advisory Committee

1. We agree. We plan to explore how the goals for the American Community Survey (ACS)-driven Master Address File (MAF) update process differ from the design and analysis goals for the 2010 Sample Redesign surveys. One significant difference between the designs is that the redesign surveys have primary sampling units (PSUs), and the ACS does not. Because the surveys have a PSU-based design, the priorities for updating the MAF for the redesign surveys will be different form the ACS, which is in all counties. We will look further at the systems currently used to update the MAF (e.g., the delivery sequence file, the Community Address Updating System, etc.) and determine how best to balance the use of these systems used by ACS with the current surveys' needs.

- 2. We have begun to implement an evaluation program, the Frame Assessment for Current Household Surveys (FACHS). The FACHS has produced the first set of quality measures for the MAF on the portion of the country with a relatively higher percentage of incomplete addresses or in non-permit issuing areas (mostly rural). The FACHS will also produce coverage and content quality measures for the MAF for the entire Nation, for new construction, and for several sub-universes where targeted MAF improvements will more likely be needed. The FACHS evaluations will be repeated to produce several sets of quality measures over time. We have begun to communicate this evaluation plan across the Census Bureau and with survey sponsors. For the longer term, we also have in our plan to develop an evaluation program to conduct ongoing evaluations of the MAF as related to our surveys' needs.
- 3. The Census Bureau is committed to, and is interested in, the precision of all ACS estimates. Our research agenda for 2006 and 2007 includes a project to improve the precision of ACS estimates for small areas, which the Census Bureau is considering to use to improve the 2010 Sample Redesign. We also plan to conduct research on the correlation of ACS variables for both PSU stratification and systematic sampling sorts.
- 4. We will add stability analysis to our research on variables to use in stratification.
- 5. We will explore other integration approaches, such as the approach being developed by the Office of National Statistics in the United Kingdom.

Population Association of America Advisory Committee

"The PAA/AC submits the following:

LUCA/MAF

"The PAA/AC commends the Census Bureau on the improvement of the Master Address File (MAF), as a result of the TIGER/MAF realignment effort and the Community Address and Updating Survey (CAUS).

The Census Bureau program for updating the Master Address File is inadequate, however, because it lacks a component for regular contact with local governments. The PAA/AC recommends an annual program similar to the decennial Local Update of Census Address (LUCA) program to continuously improve the quality of the MAF. State, local and tribal government participation throughout the decade will enhance the Census Bureau's efforts to identify new construction, demolished housing units, and incorrect addresses. However, the Census Bureau will not begin development of a continuously updated address file until after the 2010 Census."

Census Bureau Response

The Census Bureau places a high value on input to its address list from tribal and local governments as evidenced by its emphasis on the 2000 Census LUCA program and its

commitment to enhancing LUCA for the 2010 Census. We also understand the importance of regular contact with local governments; as an example, we have maintained a high and continuously improving response to our annual Boundary and Annexation Survey in which we collect data on corporate status and boundaries from local and tribal government officials.

The 2010 LUCA program is imminent; we will be contacting all eligible government participants about the program in January 2007 and begin sending out review materials in July 2007. As we look ahead to the next decade, we already are considering how we can best take advantage of local knowledge to keep the Master Address File up-to-date. Last year, we engaged Booz-Allen-Hamilton to prepare an analysis on future maintenance of the MAF (*Post-2010 MAF Maintenance: Establishing the Business Case*, January, 2006, attached). A key recommendation of the report was for the Census Bureau to increase its use of local and tribal address knowledge through an ongoing collaborative review.

The Census Bureau will continue to evaluate whether its expanding technical capabilities and the increased availability of digital spatial data from local governments and other sources can support a cost effective and more continuous update of its address information through partnerships with local and tribal governments.

Units in Structure

"The PAA/AC recommends that a question on units in structure be added to the 2010 Census questionnaire. It is essential for a full evaluation of census coverage. This includes a possible post-census local review. The Census Bureau should have some idea of how well it captured the housing stock of an area, which will provide it with some degree of confidence that these data are adequate for stratification and frame purposes for post-2010 surveys. Moreover, knowledge of units in structure from the census enumeration will help the Census Bureau in its efforts to properly sort out apartment units in small multi-family buildings and evaluate the adequacy of the MAF for these purposes."

Census Bureau Response

Although we appreciate the possible benefit to coverage evaluation of adding a units in structure question, the Census Bureau does not plan to collect information about units in structure on the 2010 Census questionnaire. There is limited space on the form. In addition, there is limited space for items necessary to administer the census itself, including questions to improve census coverage. Our experience in asking units in structure leads us to conclude that it is less effective in improving coverage than the questions we are including. Instead of collecting units in structure on the short form, we will be collecting a set of geographic coordinates for each structure when we conduct our Address Canvassing operation to update the MAF. Each individual unit within the structure will be "attached" to the coordinate for the structure, and this information will be stored in the MAF and TIGER database. Using the information from the coordinates for each structure, we will be able to calculate the number of units in structure. By storing this information in MAF and TIGER, it could potentially be updated throughout the decade by the Demographic Area Address Listing program, ACS, and the current surveys.

PSU Stratification

"The PAA/AC submits the following:

- 1. The PAA/AC's major recommendations in regard to using the ACS data for PSU stratification and selection and within-PSU selection are as follows:
 - a. First, in regard to the PSU stratification and selection, the PAA/AC notes that approximately 24 percent of U.S. counties have a population of 65,000 or more; 33 percent have between 20,000 and 65,000; and 43 percent of U.S. counties have less than 20,000. Before committing to a major departure from the "one-year" 2000 sample redesign, the Census Bureau should explore the feasibility of aggregating counties so that annual estimates can be developed in 2010 that make sense for PSU stratification.
 - b. Second, in regard to within-PSU selection, we again recommend the feasibility of considering the aggregation of counties such that annual estimates can be used in 2010.
- 2. The PAA/AC's major recommendation in regard to integrating the ACS with other household surveys is that this not be implemented too quickly. It is tempting to consider the efficiencies that could be gained by integrating these surveys. However, we caution that a lot of "eggs" are already in the ACS basket and we are concerned that if these national surveys are added to the collection, they will be jeopardized if the ACS falters."

Census Bureau Response

- 1.a. We intend to aggregate counties into Primary Sampling Units (PSUs). However, we will not be able to make all PSUs large enough to use "one-year" ACS estimates because of field constraints on interviewer assignment coverage.
- 1.b. As with 1.a., we intend to aggregate counties into PSUs. However, we will not be able to make all PSUs large enough to use "one-year" ACS estimates because of field constraints on interviewer assignment coverage.
- 2. We are not currently planning to integrate the ACS with other surveys. However, as the ASA Committee suggested, we will investigate what the Office of National Statistics in the United Kingdom is doing to integrate surveys.

Recommendation 8

Aligning Data Requirements with Accounting Practices

American Economic Association Advisory Committee

"The AEA/AC commends the Census Bureau on its efforts to improve the accuracy, response rates, and lower costs of its surveys by aligning its questions with accounting conventions.

In response to the Census Bureau's query about experiences or alternative organizational learning models, the Committee suggests the following:

- 1. As turnover occurs, consider replacing some existing survey statistician positions with professional accountants to create teams of specialized professionals (accountants, statisticians, economists, etc.) rather than attempt to increase significantly the accounting knowledge of all current survey statisticians. Businesses have used this team-of-experts model to successfully solve similar complex data analysis, production and reporting problems.
- 2. One alternative organizational learning model not mentioned by the Census Bureau consists of joint session training programs. The NABE has used this model to teach new business economists about economic data: it brings together senior Census Bureau, BEA, BLS, FRB data producers and senior business economists who use the data to jointly teach new business economists about government data and how it is analyzed in a business setting. The Census Bureau could ask the American Institute of CPAs or FASB to work with them in a similar training/working setting to teach the Census Bureau statisticians and survey specialists how firm accountants view the Census Bureau's survey questions. This approach would enhance the other professional development methods mentioned by the Census Bureau, all of which the Committee endorses.
- 3. Regarding the increasing complexity of the accounting system, the committee recommends the Census Bureau develop expertise in accounting software. For example, the Census Bureau could communicate with accounting software developers to inform them of the Census Bureau survey requirements and attempt to encourage the development of software modules that would facilitate reporting of survey data.

The Census Bureau asked if full or detail reporting at the establishment level is still as relevant as it once was. The Committee acknowledged the validity of the question and noted that it may vary by industry. For example, manufacturing firms may have excellent raw material input-cost related data by establishment, but at-best allocated revenue and overhead cost information. Retail firms, on the other hand, might have excellent revenue-related establishment information, but poor or non-existent input-cost related information. To the extent the firm is the most-relevant economic entity for analysis, establishment-level data may be less necessary that it used

to be. The Committee recognizes for some measures, especially those related to labor, remain important at the establishment level."

Census Bureau Response

Budget permitting, we plan on hiring additional accountants. However, we do feel that additional professional development should also include accounting orientation. Our goal is not to turn survey statisticians into accountants, but to provide them with knowledge to enable them to recognize and resolve reporting problems and issues.

We agree that utilizing joint-session training is an efficient and relatively low-cost method to transfer knowledge. We intend to explore the committee's recommendation to develop such programs with the American Institute of Certified Public Accountants, as well as other professional accounting associations including the Institute of Management Accountants.

Accounting software has become less complex as applications have moved toward relational databases. We believe the issue is not with the application developers, but rather the end users and that there is more to be gained by improving the "sophistication" of survey teams about accounting classification structure and chart of account design that application developers or end users becoming knowledgeable about our surveys.

Recommendation 9

Research on the Use of Population Estimates as Controls in the ACS

American Statistical Association Advisory Committee

"The ASA/AC encourages the Census Bureau to broaden its research framework on ACS accuracy to include ideas from the literature on combining information from multiple sources, one example being work that has been done on using information on demographic sex ratios to improve census coverage estimates.

The ASA/AC commends the Census Bureau for undertaking this research on the effect of population controls on ACS estimates. This is an important problem with far-reaching consequences. The four research priorities outlined in the paper will result in a great deal of useful knowledge about county-level population controls. The research proposed about the accuracy of county by age by race by sex population estimates is essential for deciding what levels of population controls should be applied to the ACS.

We believe it would be helpful while conducting this research to define the population parameters or the ACS. If you had a complete daily census of all quantities of interest, what population parameters would you report for the year? Evaluation of population controls for the ACS could then be measured by how well the controlled estimates correspond to population parameters of interest under various scenarios. When comparing population-adjusted estimates with independent benchmarks, it is important to ensure that the independent benchmark measures the parameter being estimate.

The seasonality research is very important. It might be illuminating to explore, using ACS data, how much of a role seasonality may play in the accuracy of the population estimates. This could ultimately lead to better models for the intercensal population estimates.

Some additional metrics might be useful in the Bureau's evaluation. In addition to examining mean absolute percentage error of the population estimates for different classifications, it would also be useful to examine the distribution or percentiles of those areas. We recommend in-depth examination of the outliers from the population models.

We recommend continued research on how to incorporate errors in the population controls into measures of uncertainty for the ACS."

Census Bureau Response

The Census Bureau agrees with the committee's recommendation that the Census Bureau conduct evaluations and additional research to better understand the relationship between the ACS population parameters and the independent estimates produced by the Population Estimates Program. Our evaluation on the quality of county level population estimates, supplemented by results from the seasonality research, will provide a great deal of information that will enhance our understanding of this subject.

The Census Bureau also agrees with the recommendation to incorporate additional metrics into our estimates analysis and plans to include an examination of the distributions of the errors into the evaluation of the state and county population characteristics. Additionally, we agree that our analysis would be improved by using exploratory data analysis and other statistical techniques to identify statistical outliers for a more in-depth examination.

However, the Census Bureau does not agree with the recommendation to incorporate errors in the population controls into measures of uncertainty for the ACS. Rather, we would prefer to develop methods to reduce or eliminate error components in the population estimates before using the controls in the ACS weighting process.

Population Association of America Advisory Committee

"The PAA/AC submits the following:"

Evaluation of Post-2000 County Estimates

"The PAA/AC commends the Census Bureau on the planned research projects to determine the type and level of population controls to use in the ACS and to evaluate the post-2000 county estimates by demographic characteristics.

Given the critical role of the Census Bureau estimates to distribute federal funds and control numerous household surveys, the PAA/AC recommends the Census Bureau use independent population estimates developed by their state partners in the Federal/State Cooperative Program

for Population Estimates (FSCPE) as one type of evaluation of the post-2000 estimates series."

Census Bureau Response

The Census Bureau agrees with the recommendation to use independent population estimates developed by members of the Federal State Cooperative Program for Population Estimates (FSCPE) as one of the benchmarks in the evaluation of the post-2000 estimates series. We are also working with members of the FSCPE Steering Committee to increase the participation of FSCPE members in the review of the Census Bureau estimates. The agenda of the upcoming fall meeting of the FSCPE will include training and workshops that focus on these data and methods used to develop the Census Bureau estimates and techniques developed by state partners to review the outputs of the estimates process.

Reliability of Small Area ACS Data

"The PAA/AC commends the Census Bureau in its efforts to create useful data for small areas from the ACS. The level of reliability of small area estimates remains a big concern for many users, however. The Census Bureau needs to provide the data user community with an update on the level of sampling variability that is likely for estimates in places of under 20,000 residents. Confidence intervals need to be presented for key items such as poverty level for places, minor civil divisions (MCDs), and/or census tracts of different sizes. We recommend that these examples be drawn from the data already compiled for 2000 to 2005 in the test areas. In addition, the Census Bureau should provide the data user community with an update on what the confidence intervals will look like for larger areas in the 20,000 to 65,000 population range, on both a three-year and five-year basis."

Census Bureau Response

The Census Bureau agrees that we should provide information about the sizes of confidence intervals for areas of size greater than 20,000. We are currently carrying out research on developing methods to reduce variances of estimates for areas with smaller populations. We will need to complete this work before presenting examples of the sizes of corresponding confidence intervals. We anticipate that the results of the research will be available in advance of the next meeting of the Census Advisory Committee of Professional Associations.

Housing Unit-Based Population Estimates

"The PAA/AC recognizes the difficult nature of corroborating intercensal estimates of population and commends the Census Bureau for its efforts on behalf of the data user community. The Census Bureau's own research shows that housing unit based methods of population estimation hold promise as an alternative to the current components of change approach. The Census Bureau should continue to explore the utility of adopting housing unit based methods of population estimation at county and subcounty levels, as part of an integrated approach to the creation of intercensal population estimates."

The Census Bureau agrees with the recommendation of the PAA/AC and plans to continue to explore the utility of adopting housing unit based methods of population estimation at county and subcounty levels as part of an integrated approach to the creation of intercensal population estimates. The Census Bureau has outlined an ambitious research plan to enhance the current housing unit based approach and to identify areas where the current component of change and housing unit approach produce discrepant estimate results. We will work with the Research Subcommittee of the Federal State Cooperative Program for Population Estimates to review the plan and to identify resources that could work together to implement the plan.

Recommendation 10

SIPP and Reengineering Our System to Measure the Dynamics of Economic Well-Being

American Marketing Association Advisory Committee

"The AMA/AC does not believe that members of the AMA are core users for SIPP data. AMA members have substantial interest in topics such as the existence and nature of consumer relationships with financial institutions, consumer financial planning, retirement planning, extrahousehold financial arrangements, and childcare, but it is our perception that AMA members typically rely on sources other than SIPP for such information. Accordingly, we do not view AMA members as core stakeholders in SIPP reengineering.

Having said that, it is difficult to provide concrete input at the present time since it is not clear what information may be available from administrative records. We will be happy to provide input as the situation becomes more clear."

Census Bureau Response

We will continue to hold periodic meetings discussing the design and content of the new system and to keep you informed of development that may be of interest.

American Statistical Association Advisory Committee

"In regard to the use of administrative records in combination with survey data, the ASA/AC has substantial concerns about the privacy and confidentiality issues raised by the linkage of SIPP survey data with variables that are available only on administrative records. We recommend continued research on strategies that address privacy and confidentiality concerns that further the goal of disseminating information on the dynamics of economic well-being as broadly as possible.

As a possible vehicle for addressing the imperative of disseminating information on the dynamics of economic well-being while protecting the confidentiality of micro-data records, the ASA/AC encourages consideration of expanding the Census Research Data Center network,

perhaps very substantially, with the potential of broadening access both for other federal agencies and for researchers across the country. To this end, we encourage the Census Bureau to review and potentially broaden the scope of research deemed to meet Title 13 criteria for being useful to the Census Bureau."

Census Bureau Response

The Census Bureau is aware of the confidentiality challenges and special protections that may result from the use of administrative data in a longitudinal context. The Disclosure Review Board, Census Bureau's inter-divisional group charged with protecting the confidential of all data products, will review the output from the prototype at each stage of development and will assist in addressing confidentiality issues as they arise. Our goal is to provide a public use file to the data user community.

We are aware of the difficulty in providing external access to survey data that has been matched with administrative records data. Once the scope of the use of administrative records in the reengineering project becomes clear, we expect to investigate all means possible, including the Research Data Center (RDC) program, to make the matched survey and administrative data available to independent researchers. Methodological research, especially of new surveys, is always of interest to the Census Bureau, and is allowed under the statute authorizing Special Sworn Status employees to have access to confidential microdata (Title 13, Section 23 (c)). In order to maintain both the fact and the appearance of impartiality, the Census Bureau has not approved projects at the RDCs that are solely interested in evaluation of public policy. Non-profit organizations and academic institutions may apply through the established National Science Foundation-sponsored process to open new RDCs. However, the Census Bureau does not have the resources to greatly expand the number of RDCs.

Population Association of America Advisory Committee

"The Census Bureau is to be commended for its intent to reengineer the Survey of Income and Program Participation in order to preserve its most vital functions, improve data quality, and achieve necessary cost efficiencies.

- 1. As a first step, the PAA/AC recommends that the Census Bureau ascertain the areas of SIPP overlap in content with on-going surveys and administrative data, and make information on unique and duplicate items available to the broader user community for comment on information that must be preserved in new data collection.
- 2. As the broad scope integration of administrative data in a longitudinal context may raise new confidentiality challenges, the PAA/AC encourages the Census Bureau to give careful consideration to the special protections that may be required.
- 3. In light of the importance of SIPP to labor and welfare researchers, the PAA/AC

recommends that the Census Bureau again invite comments from the American Economic Association Advisory Committee."

Census Bureau Response

1. One of the goals of the reengineered system is to make use of existing survey data (the American Community Survey or the Current Population Survey's Annual Social and Economic Supplement are currently under consideration), as well as to capitalize on the advances that the Census Bureau has made in acquiring and integrating administrative records with survey data. We are in the process of determining the alignment of the Survey of Income and Program Participation (SIPP) core content with currently available administrative data sources (including an evaluation of the coverage of the administrative records source and the time lag between when the data are collected and when they are available at the Census Bureau). The results of these alignment "exercises" will have an impact on the content for the reengineered system.

The Census Bureau is committed to involving its many stakeholders in all phases of the design, development, and implementation of this reengineering. We will continue to work closely with federal and external stakeholders and data users to ensure that the content of the new survey instrument addresses their critical data needs and provide them with the results of the alignment exercises.

- 2. The Census Bureau is aware of the confidentiality challenges and special protections that may result from the use of administrative data in a longitudinal context. The Disclosure Review Board, Census Bureau's inter-divisional group charged with protecting the confidential of all data products, will review the output from the prototype at each stage of development and will assist in addressing confidentiality issues as they arise.
- 3. Since the CACPA meeting, we held a meeting with major federal stakeholders, we conducted a roundtable at Brookings Institution attended by federal, private, and congressional stakeholders, and are planning another meeting, open to the public, tentatively scheduled for later this summer at the Census Bureau's Headquarters in Suitland, Maryland. We will consider contacting the AEA members directly in order to obtain their comments and suggestions. In a further effort to obtain and consider user suggestions, we have added a new button (labeled Dynamics of Economic Well-Being) on the SIPP home page (www.bls.census.gov/sipp) where interested parties can send messages to us about their suggestions, concerns, etc., about the new program, as well as find recent information about the new system. The Census Bureau will continue to hold periodic meetings throughout the life cycle of this reengineering in order to solicit input from our stakeholders.

Recommendation 11

Resubmitted Recommendation: Foreign-born and Foreign-stock Populations

Population Association of America Advisory Committee

"The PAA/AC finds the Census Bureau's response to Recommendation 3D from the October 20-21, 2005, CACPA meeting to be unsatisfactory. The PAA/AC had recommended that the new Strategic Planning and Innovation Directorate consider providing better and more comprehensive data on the foreign-born and foreign-stock populations. In its recommendation, the PAA/AC expressed particular interest in data that would allow the identification and study of different generations (first, second, third and higher), legal status, and improved measures of English and other language proficiency among the foreign-born population.

In its response, the Census Bureau directed the PAA/AC to a link that was supposed to contain a table package of the 2004 foreign-born population released by the Immigration Statistics Staff in 2005. The PAA/AC has two reactions to this response: First, the link is no longer available, and the table package is not accessible for review. Second, the table package was based on data from the Current Population Survey (CPS).

The PAA/AC knows well that the CPS has been, for many years, the only Census Bureau survey that allows the identification of the first, second, and third generations. However, in recommending that the new Strategic Planning and Innovation Directorate consider providing better and more comprehensive data on the foreign-born and foreign-stock population, the PAA/AC had hoped that there would be a more satisfactory response than to simply refer to the CPS as the only source of data on the foreign-born and foreign-stock populations.

The PAA/AC also found the Census Bureau's response to the recommendation on improved measures of English and other language proficiency inadequate. The Census Bureau's response was to refer to a 2003 study of adult literacy by the National Center for Education Statistics in the Department of Education, a study that primarily focused on English-language literacy among the mainly native-born population.

In sum, the PAA/AC finds that the Census Bureau's response amounted to basically doing nothing that would be new or innovative in terms of data and research on the foreign-born and foreign-stock populations. This reflects a failure to understand the importance and significance of the Committee's recommendation regarding the foreign-born and foreign-stock populations. The foreign-born and foreign-stock population is growing rapidly, and is increasingly diverse along key characteristics such as human capital, legal status, national origins, etc. In addition, the foreign-born population is dispersing and increasingly settling in areas that did not receive many immigrants in the past, such as small towns and rural areas in the southern and midwestern regions of the United States. These trends contain important demographic, social, economic, and political implications, as well as for the many federal programs, including voting rights, fair housing, healthcare, and educational programs.

The PAA/AC therefore resubmits the following revised Recommendation 3D from the October 20-21, 2005 meeting:

The PAA/AC recommends that the new Strategic Planning and Innovation Directorate consider

providing better and more comprehensive data on the foreign-born and foreign-stock populations. The foreign-born and foreign-stock populations are increasing rapidly and are a growing proportion of the U.S. population. This population is diverse in national origins, human capital, legal status, etc., and is also dispersing throughout the country. The PAA/AC is particularly interested in data other than the Current Population Survey that would allow the identification and better study of the foreign-born and foreign-stock populations. The PAA/AC is particularly interested in data that would allow the identification and study of the foreign-born and foreign-stock populations by generation, including data on legal status (not limited to citizenship status) and improved measures of language proficiency (oral and written) in both English and other languages.

Second, given the importance of the topic of immigration for researchers, and the visibility of the topic for public policy and in public debate, the PAA/AC recommends that an update by the Immigration Statistics Staff be included in the October 2006 agenda at the next CACPA meeting."

Census Bureau Response

First, the Census Bureau apologizes for providing an incorrect link. The appropriate link refers to a table package ppl-176, and when typing the document we accidentally substituted the numeral "1" for the letter "l," thus producing an incorrect link. It was inexcusable for us not to provide a correct link. The correct link (for the Current Population Survey) on characteristics of the foreign-born is http://www.census.gov/population/www/socdemo/foreign/ppl-176.html>.

The Census Bureau agrees with the committee's view on the importance and significance of the foreign-born population. In 2007, we plan to publish a CPS "Generations" report. This report will take advantage of CPS information and analyze first, second, and third generation persons. While the CPS provides an important source of data on the foreign-born population, the Census Bureau is also looking at other sources of data. With regard to the American Community Survey, our latest table package is from 2003, and we expect to publish a 2004 table package within the next few months. Our 2004 table package is expected to have additional details not in prior table packages. The link for the American Community Survey on characteristics of the foreign-born is http://www.census.gov/population/www/socdemo/foreign/acst2.html>.

We would like to bring to the committee's attention a set of detailed tables we have constructed from Census 2000 on characteristics of the foreign-born, by state and by country of origin. As of June 29, 2006, not all states are published, but they have been produced, and you should expect to see them on a flow basis in the very near future. The link is http://www.census.gov/population/www/socdemo/foreign/acst2.html>.

In addition, we are working on a special mapping project that will display the characteristics of foreign-born persons on U.S. maps, using the above-mentioned Census 2000 data. It is scheduled to begin placing them on our Web page later in 2006.

The Census Bureau is conducting research to prepare aggregate estimates of legal status based on

existing data. We are testing four qualitatively different methods for constructing such estimates at the national level.

The Census Bureau has expanded its use of questions on language use and ability in recent years, but there are few opportunities to continue this trend in the immediate future. The SIPP added a question on language use beginning in 2003. However, the new Dynamics of Economic Well-Being Program, which will replace SIPP, will have reduced content. This will make it difficult to expand the series of questions on language use and ability.

The CPS and ACS are also not good targets for adding new content on language use. The CPS does not currently have a language use question at all. The ACS question, as mentioned in the original Census Bureau response, is identical to the question asked in each census since 1980. Given the sensitivity of responses to small modifications in question wording, a change would likely disrupt the time series. The benefits of any modification to the question would have to be weighed against this drawback.

Finally, there are practical limits to using Census Bureau questionnaires to measure literacy in various languages, in that our surveys have not traditionally contained "tests" of the population, and it would require a policy change to move in this direction.

The Census Bureau welcomes the opportunity to provide the committee with an update on the work of the Immigration Statistics Staff. The Census Bureau provided an update to the Asian Committee of REAC at their May 2006 meeting and can provide an update to the PAA/AC at a future meeting.

Recommendation 12 (GEO)

Resubmitted Recommendation: MAF/TIGER

Population Association of America Advisory Committee

"At the October 2005 CACPA meeting, the PAA/AC recommended that the Census Bureau provide an inventory of internal MAF uses to the committee before the May 2006 meeting and give a presentation on these uses at that meeting. This would provide a better understanding of the multiple uses of the MAF/TIGER database for Census Bureau operations and would aid in integrating operations.

The response from the Census Bureau to the above was inadequate concerning the level of detail about the universe selected for each survey. Therefore, the PAA/AC is resubmitting this recommendation. (See Recommendation 6, October 20-21, 2005, CACPA meeting)."

Census Bureau Response

We do not fully understand why the previous response was not accepted, and would be happy to discuss with you during your review of the recommendations at the upcoming fall 2006 CACPA meeting.

Recommendation 13

Resubmitted Recommendation: Institutional Review Boards

Population Association of America Advisory Committee

"The PAA/AC reiterates and clarifies its previous Recommendation 2B (A) from the October 20-21, 2005, CACPA meeting.

Census users, particularly at universities, must routinely convince their own Institutional Review Boards (IRBs) that the public use data they employ qualify for an exemption from an institutional human subjects review on their campus. The PAA/AC recommends that the Census Bureau post on its web site a brief statement that users can adopt addressing IRB concerns, such as the absence of personally identifying information in census public use records."

Census Bureau Response

The Census Bureau uses statistical methods to ensure that the statistics we release do not identify individuals or businesses. These methods include extensive review and analysis of all our data products, as well as disclosure avoidance methodologies, such as data suppression and modification to screen out data that might identify a specific individual or business. To ensure these measures are implemented, the Census Bureau has an internal Disclosure Review Board (DRB). This board sets the confidentiality rules for all data product releases. A checklist approach is used to ensure that potential risks to the confidentiality of the data are considered and addressed before any data are released. In addition, our Data Stewardship efforts extend beyond the law to ensure that any decisions we make will fulfill our ethical obligations to respect respondent privacy and protect the confidentiality of the information entrusted to us. Our Privacy Principles - *Necessity, Openness, Respect* and *Confidentiality* - remind us of this promise and help to ensure the protection of personal information throughout all of our activities. Further, they help to guide us as we design surveys to consider respondents' rights and concerns.

Information about how we protect personal information, including our use of statistical safeguards and our Data Stewardship Program and policies, is available on the Census Bureau Web site and can be accessed via the following link: http://www.census.gov/privacy/files/data_protection/002825.html>.

Recommendation 14

Additional Recommendation: National and State Population Projections

Population Association of America Advisory Committee

"The PAA/AC is concerned about the Census Bureau's ability to produce timely comprehensive population projections for the U.S. as a whole and its states. The interim national projections consistent with Census 2000 were released in March 2004 and the interim state projections consistent with Census 2000 were released in April 2005. Final national projections consistent with the 1990 census were not released until January 2000 and final state projections consistent with the 1990 census have still not been released (although "state projections consistent with the 1990 census" were released in October of 1996).

The PAA/AC recommends that steps be taken such that a set of final national and state projections consistent with the 2000 census can be released before 2010."

Census Bureau Response

The Census Bureau appreciates the interest of the committee in its Population Projections Program and regrets the delay. We are moving to replace two senior members of the Population Projections Branch who have died in the last 12 months, (including the chief of the Branch), and one other professional who retired. A set of national and state population projections consistent with Census 2000 will be produced and disseminated well before 2010.

Recommendation 15

Additional Recommendation: Meeting Materials

American Statistical Association Advisory Committee

"The ASA/AC requests that a single set of materials be compiled for the meetings and sent to the Advisory Committee members at least two weeks prior to the meeting."

Census Bureau Response

The Census Bureau agrees that more timely transmittal of meeting materials to members is key to a productive discussion of Census Bureau issues. Your request that we provide a single set of meeting materials two weeks in advance is not unreasonable. On occasion, however, we may find it prudent to provide individual documents separate from the full set, on an earlier schedule, to facilitate pre-meeting conference calls with members or other needs. Similarly, as each paper presented at your meetings is specifically developed by program managers to facilitate advisory committee discussions, there may be an occasional instance where final revisions may delay our provision of a finished paper with the full set or within this time frame. These instances are

infrequent, however, and should not interfere with our goal of providing the full set of documents to you within two weeks of the meetings.

Recommendation 16

Additional Recommendation: Timeliness of Responses to Recommendations

Population Association of America Advisory Committee

"The Census Bureau's response to recommendations from the October 20-21, 2005 meeting was not sent to advisers until two days before the May 18-19, 2006 meeting. The PAA/AC members had no time to review this document and could not direct questions to appropriate Census Bureau staff during the meeting. The PAA/AC urges the Census Bureau to remedy this situation for future meetings."

Census Bureau Response

We are as distressed about the timing as is the Advisory Committee. We have improved the procedure to expedite the review by all senior staff.

Recommendation 17

Additional Recommendation: Timeliness of Information on Meeting Agenda

Population Association of America Advisory Committee

"In order to facilitate its work, the PAA/AC requests that the Census Bureau inform the committee of topics and presentations at future CACPA meetings as soon as these are available."

Census Bureau Response

It is vital for the Advisory Committee's advice to be both timely and relevant to ongoing Census Bureau activities. For that reason, we sometimes delay the approval of the final agenda until we are clear about the topics for which we need advice. On the other hand, it is important that the Committee get the background material as far in advance as possible; suggesting an early decision about topics is useful. These tradeoffs sometimes delay the final decision, but we will make every effort to decide on the agenda for forthcoming meetings as quickly as possible and then inform the Committee.